

POLICIES AND PROCEDURES
for the
EMERGENCY FOOD ASSISTANCE PROGRAM
TRIBAL VOUCHER

Revised 2009

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PREFACE

POLICIES and PROCEDURES for the Emergency Food Assistance Program

The following policies and procedures are to be used in the Emergency Food Assistance Program (EFAP) authorized by Chapter 43.330.130 RCW. If any procedure or guideline is found to be in conflict with the RCW, the RCW will prevail.

These policies and procedures shall be expanded, as necessary, during the course of the program period. If changes are made, Grantees shall receive notice of changes through numbered policy memoranda issued by the Department of Community, Trade and Economic Development (Department), Community Services Division (CSD). Such revisions shall be made in the same format as this manual. The policy memoranda shall serve as the transmittal documents to inform the Grantees of placement of revised policies and procedures within this manual.

These policies and procedures are specific to EFAP and shall be followed by the Grantees and Sub grantees receiving assistance under EFAP. Compliance with subsequent modification to this manual is also mandatory for all Grantees and Sub grantees.

Mission Statement

The mission of the Emergency Food Assistance Program is to alleviate hunger in the state of Washington by providing funds, technical assistance, and information to community programs that deliver emergency food and services to hungry people.

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DEFINITIONS

Administrative Expenses – Management and general expenses to include membership dues are those expenses that cannot be readily identified with a particular program.

Applicant – A public or private nonprofit organization, tribe, or tribal organization that applies for Emergency Food Assistance Program funding.

Authorized Signature – Signature of the board president, tribal chairperson, agency director or other official authorized to sign.

Department – The Department of Community, Trade and Economic Development (CTED).

Desk Monitoring – Conduct monitoring by requesting documentation to be mailed to EFAP staff for review at their office.

Emergency Food Assistance Program (EFAP) – The statewide activities of the Department to assist local emergency food programs by allocating and awarding state funds.

Emergency Food – Food that is given to clients who do not have the means to acquire that food themselves, so that they will not go hungry.

Emergency Food Provider – A tribe or agency that provides people who are hungry with any kind of emergency food assistance.

Grant – A legally binding agreement between the state and another entity, public or private, for the provision of goods and services. Agreements, letters of intent, memos of understanding, and grant awards are specific forms of grants.

Grantee – An applicant that has been awarded state Emergency Food Assistance Program funds, and has entered into a grant with the Department to provide emergency food assistance to individuals within a tribe or tribes.

In-Kind – The value of volunteer services or donated goods including staff time, rent, food, supplies and transportation.

Lead Tribal Grantee – A Grantee that enters into a grant with one or more tribes as sub grantees to provide emergency food assistance to individuals in the Tribal Voucher Program.

Monitoring – Any planned, ongoing, or periodic activity that measures and ensures Grantee compliance with the terms, conditions, and requirements of a grant. The level of monitoring will be based on a risk assessment of the Grantee's ability to deliver services and its performance in delivering those services under the terms of the grant

On-Site Monitoring – The physical act of going to a grantee's location to conduct monitoring.

Operational Expenses – Those costs that are clearly identifiable with providing direct services to eligible clients, or distribution services to food banks.

Risk Assessment – The process of evaluating exposure to harm or loss that could arise from an activity associated with the grant. It consists of identifying and classifying risks based on certain characteristics, and measuring and evaluating the consequences of those risks.

Sub Grantee – A tribe that enters into a grant with a tribal lead grantee to provide emergency food or food vouchers to the hungry.

Tribal Food Voucher Program – The statewide activities of the Department, which allocate and award state funds to tribes or tribal organizations that issue food vouchers to clients.

POLICY

Cancels: Policy 100, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-1.1 QUALIFYING ELIGIBLE CLIENTS

This policy applies to tribal grantees and tribal sub grantees.

1. The Department Defines Eligible Client

- Eligible clients are persons who are not able to purchase enough food for their subsistence.
- This is the minimum eligibility standard required by the state.

2. Grantees and Sub Grantees Can Make Additional Client Eligibility Standards

- Grantees and sub grantees must apply these additional standards to all clients, without prejudice.

3. Grantees and Sub Grantees Must Have Written Eligibility Standards

- Written eligibility standards must be available for clients to view.
- The Department can request copies of standards.

4. Emergency Food Providers May Define Service Areas

- Providers may self-define their service areas, but are urged to serve all clients the first time they request assistance. Providers may refer clients to other service agencies servicing the area in which the client resides, or to the tribe that has established jurisdiction over the area where the individual lives, for further food voucher assistance.
- Providers must practice nondiscrimination when applying their service area policies.

POLICY

Cancels: Policy 200, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-2.1 PERFORMING OUTREACH AND NETWORKING ACTIVITIES

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Grantees Must Have Written Outreach And Networking Policy On File

- Policy must show structure and procedures for gathering and sharing information.
- Grantees must send updates to Network Policy to CTED no later than October 1 of the first year of each new biennial grant.
- **Note:** Clients may not be denied food bank services for refusing to take available information about other programs and/or to participate in information and referral services.

2. Grantees Must Conduct Outreach and Networking Activities to Clients

All grantees and sub grantees shall register with 211 Statewide Telephone Information and Referral Network system.

- Tribes must register within 30 days of the effective start date of its grant.
- To register, a tribe can call 211 in its area or register online at www.win211.org.
- Tribes must prominently display the 211 number for the benefit of its customers.

Other networking activities may include:

- Posting information on EFAP food voucher services in public locations.
- Making food voucher information, including how to apply for tribal food vouchers, available at public facilities, at tribal and government offices, hotlines, advocacy and community social service organizations.
- Issue public service announcements about the program.

3. Grantees Must Network With Other Providers

Building strong, sustainable communities is a goal of CTED. One strategy to accomplish this is to provide information and referral links among emergency, prevention and intervention services for clients to make use of all resources available.

Grantees shall coordinate services with other advocacy and community services organizations. "Coordinate services with" is defined as making contact these programs,

sharing information about programs, and establishing procedures for referring clients between the tribal voucher program and the other services, such as:

- Local Basic Food and cash assistance programs.
- School breakfast, lunch and summer feeding programs.
- Women's advocacy organizations.
- Housing authorities.
- Senior centers.
- Area Agencies on Aging.
- Organizations for people with handicaps.
- Associations for Retarded Citizens.
- Rescue missions.
- Emergency shelters.
- Churches and religious organizations, such as the Salvation Army, St. Vincent DePaul.
- Local Department of Social and Health Services programs.
- Urban Leagues.
- Multi-cultural organizations.
- Drug & alcohol treatment programs.
- Local job training programs.
- Local employment security office.
- Public transportation facilities.

4. Grantees Must Provide Information On Available Services To Clients

Information can be handouts, pamphlets, or a list of services clients can take home with them about programs. At a minimum this information must list other social services available to clients, such as:

- Local Basic Food and cash assistance programs.
- Emergency housing, rental assistance and low-income housing.
- Job training programs including the closest employment security office.
- Child care assistance.
- School breakfast, lunch and summer feeding programs.
- Drug and alcohol treatment programs.
- Public transportation and other transportation assistance.
- Additional services that will help clients gain greater self-sufficiency.
- Energy Assistance.
- Senior services.
- Services for people with handicaps.
- Assistance for victims of crime and domestic violence.

5. Grantees Are Responsible For Sub Grantees Having Referral Information

- Grantees are responsible for making sure that their sub grantees have information to give to their clients. This may in the form of:
 - A handout or a pamphlet that lists the services and locations.
 - A pamphlet from each agency providing the above services that clients take home with them.

POLICY

Cancels: Policy 300, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-3.1 ALLOWABLE ACTIVITIES AND EXPENSES

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Grantees Can Bill Only Allowable Activities and Expenses

Grantees and sub grantees are allowed to use state funds for administrative and operational expenses, including direct service expenses.

2. Funds Can Not Supplant Other Existing Funding Sources

3. Grantees Shall Not Be Reimbursed for Unallowable Expenses

Funds awarded shall not be used for:

- Activities not related to the food assistance program.
- Administrative expenses above the allowable ten percent of the grant.
- Operational costs over the allowable five percent of the grant.
- Capital expenditures for repairs, purchases or improvement of buildings.
- Payment of mortgages or leases with option to buy.

POLICY

Cancels: Policy 300, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-3.2 ALLOWABLE ADMINISTRATIVE ACTIVITIES AND EXPENSES

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Grantees Shall Bill Only Allowable Activities and Expenses

- Grantees and sub grantees are allowed to use state funds for administration activities. Administration activities are of a general nature not clearly identifiable with a particular program.
- These activities include: planning, budgeting, accounting and the establishment and direction of the grantee's goals, policies, and objectives.

2. Administrative Expenses Are Limited

- Administrative expenses for food voucher grantees, including lead tribal grantees who provide direct emergency food voucher assistance, are limited to 10 percent of the total grant award.
- As a lead grantee, administrative expenses are limited to 10 percent of the total grant award.
- However, total administrative costs for lead tribal grantees who also provide direct voucher services may not exceed 15 percent of the total grant award.

3. Grantees And Sub Grantees May Budget For Membership Dues

- Up to one percent of EFAP funds may be budgeted as administrative costs for membership dues to organizations whose concerns address anti-hunger and health issues.
- The membership dues will not be counted toward the maximum 10 percent allowed for administration.

4. Administrative Funds Returned Proportionally to Grant Budget

Grantees returning unexpended funds to the Department during the grant period shall return administrative funds in proportion to the grant budget unless administration funds have already been transferred to another budget category during the course of the grant.

5. **An Agency May Charge Its Indirect Costs In The Appropriate Proportion To EFAP Administration.**

- The indirect charges may not exceed the ten percent allowed for administrative costs.

6. **Administrative Expenses May Include The Following Costs**

- Salaries, wages and fringe benefits for administrative staff.
- Office supplies and lease, rental and repairs of equipment.
- Travel expenses for administrative staff.
- Rental or lease of space.
- Telephone, postage, mailing, printing, and copying.
- Insurance and audit costs.

POLICY

Cancels: Policy 300, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-3.3 ALLOWABLE OPERATIONAL ACTIVITIES AND EXPENSES

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Grantees Shall Bill Only Operational Allowable Activities and Expenses

Operational activities and expenses are those activities clearly identifiable with providing direct services to clients.

- Operational costs may include:
 - Personnel costs – salaries, wages and fringe benefits for personnel who are actually performing duties related to client service, including networking and outreach activities.
 - Travel/Transportation – mileage expense related to direct provision of services.
 - Space Costs – rent or lease payments for facilities and costs of power, heat and water for space occupied by program staff.
 - Communication cost (telephone, mailing and printing) for direct program services.
 - Other operational costs, such as supplies and equipment directly related to providing services.
- Equipment purchases shall not exceed \$500 and do not require prior approval by the Department.

3. Operational Expenses Are Limited

Operational costs for tribal food voucher grantees and their sub grantees are limited to five percent (5%) of their grant amount.

4. Operational Expenses Returned Proportionally to Grant Budget

Grantees who return unexpended funds to the Department shall return operational funds in proportion to the grant budget unless operational funds have been transferred to another budget category during the course of the grant.

POLICY

Cancels: Policy 300, April 8, 2008

See Also: Exhibit A - Essential Non Food Items List

Approved by: Susan Eichrodt

POL-3.4 VOUCHERS AND ALLOWABLE EXPENSES

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Voucher Expenses Definition

Voucher expenses are defined as the face value of the food vouchers issued to clients.

2. Purchase Essential Food and Nonfood Items Only

- Vouchers may be issued to clients to purchase **essential** food and nonfood items only.
- Tribes may choose to set more strict policies policy on what essential foods and nonfood items can be purchased than the state dictates. Limitations on purchases must be identified in the tribe's Food Voucher Program policies. (See Exhibit A for allowable nonfood items.)

3. Items That Can Not Be Purchased

Grantees shall not ask for reimbursement through EFAP for unallowable items. Tribes may choose to be more restrictive. These include items **such as** and the like with vouchers:

- Any kind of carbonated beverage or flavored sugared drinks such as soda, pre-made Kool-Aid or packets to make, all flavored water, Gatorade, Sobe-type drinks, any energy drinks, on-the-go drink packets, all sports drinks.
- Candy, gum, cookies or other "snack" foods such as potato chips and ice cream.
- Any kind of alcoholic beverages and liquor.
- Any kind of tobacco products and cigarettes.
- Any kind of desserts, such as pies and cakes.
- Any kind of donuts, breakfast pastries and muffins.
- Any kinds of bottled water unless the family's tap water is unfit to drink.
- Pet food and pet supplies.
- Cosmetics, hair dye, hair products, body lotions and hand lotions.
- Furnishings and non-essential household items such as furniture polish and carpet cleaner.

POLICY

Cancels: Policy 300, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-3.5 MATCH REQUIREMENTS FOR TRIBAL VOUCHER PROGRAM

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Match Is 35 Percent of The EFAP Funds Award

- Tribal grantees and sub grantees tribes must at least match 35 percent of their EFAP grant awards with funds from other sources.
- At least 50 percent of the minimum required match must be cash (hard match).
- The balance of the required match may be in-kind contributions (soft match).
- These requirements pertain to tribes that participate in the food bank, the food voucher, or both programs.

2. Grantees and Sub Grantees Determine In-Kind Values

In-kind contribution is the value that is placed on donated services, materials, equipment, food, and other, as determined by grantees and sub grantees. The determination is based on the following:

- Services/Labor – Identify the number of hours provided, and the hourly value (to be determined by the tribe or agency, based on a fair market salary, minimum wage or CTED's current suggested value of \$10 per hour). Calculate the total for each volunteer.
- Equipment/Supplies – Use the amount the donor has declared. If not available, estimate a fair market value.
- Transportation – Donated volunteer mileage is calculated at the current state rate. Use actual cost of donated transportation as declared from commercial carriers.

POLICY

Cancels: Policy 400, April 8, 2008

See Also: POL 4.2 & POL 4.3

Biennial Application

Approved by: Susan Eichrodt

POL-4.1 APPLICATION PROCESS

This policy applies to tribal grantees and tribal lead agency grantees where indicated.

1. EFAP Grants Cover a Two-Year Period

EFAP grants shall begin the first day of the biennium, July 1, and end on the last day of the biennium, June 30.

2. The Department Distributes and Receives Applications

- The Department shall:
 - Distribute all grantee and sub grantee applications in the spring.
 - Maintain a statewide mailing list of emergency food programs and tribes.
 - Accept Tribal Food Voucher, tribal food bank and combination food bank/food voucher applications throughout the state from all tribes and tribal organizations that meet eligibility requirements.

3. The Department Computes the Allocation of Funds for Tribes

The Department computes Tribal Food Voucher allocations to each tribe based on a formula determined by the Department in consultation with the Tribal Advisory Committee. That formula, in general, will be computed as follows:

- A baseline amount to all tribes participating in the program.
- The remaining funds based on other criteria that measure need.

4. Specific Requirements Must Be Met in Applying for Funding

- Tribes that are federally recognized and unrecognized tribes designated as 501C3 nonprofit agencies may apply for the EFAP Food Voucher Program directly to CTED or under another agency or tribe of their choice.
- Tribes receive the same allocation whether they participate in the voucher, food bank or both programs.

- Applicants must complete all forms and follow all procedures established by the Department.
- Applicants must adhere to all application and grant timelines specified by the Department when applying for funding.
- Failure to do so may result in denial of the funding request.

POLICY

Cancels: Policy 400, April 8, 2008

See Also: POL 4.1 & POL 4.3

Application Assurances

Approved by: Susan Eichrodt

POL-4.2 CRITERIA FOR PROSPECTIVE TRIBAL GRANTEES AND LEAD GRANTEES

This policy applies to tribal grantees and tribal lead agency grantees where indicated.

1. Grantees Must Meet One of the Following Criteria

- Be a federally recognized tribe.
- Be a tribal organization with IRS 501(c) 3 status.
- Be an unrecognized tribe with IRS 501(c) 3 status.

2. A Lead Tribal Grantee or Tribal Grantee Must Have Granting Capabilities

- Have management capabilities to administer a grant with the Department.
- Have internal control and fund accounting procedures to include securing adequate fidelity insurance to assure the proper disbursement of, and accounting for, all funds.
- Have public liability insurance to protect against legal liability arising out of services under this grant. The grantee will protect, save, and hold harmless the Department, the State of Washington and their authorized agents, officers, and employees.
- Undergo an annual A-133 audit if it receives federal funds totaling \$500,000 or more per year from all sources, or must undergo an independent financial audit once every two years if it receives \$100,000 or more per year in state funds from all sources. If neither audit standard applies, must have an Accounting System Verification Form completed by an independent CPA with each biennial application.

3. Match Is Required

- A Tribal grantee must match its EFAP funds with at least 35 percent in other funding. At least half of that match must be cash funding. The remaining match may be in-kind donations of food, labor, transportation, or other. (See Policy 3.5 for further details.)

4. All Grantees Shall Practice Nondiscrimination in Services and Employment

- Tribes agree to comply with all state and federal laws regarding discrimination to the extent that those laws are applicable to the tribes for the activities that the tribes carry out pursuant to this Agreement.
- Nothing in this Agreement shall interfere with, or be construed as interfering with, tribes' employment and granting processes regarding Tribal and Indian preference as allowed by law.

5. Written Policy Required For Client Information Collected By All Grantees

- Must have and adhere to a written policy that personal information collected, used or acquired in connection with any state-funded program shall be used solely for the purpose of that program.
- Agree not to release, divulge, publish, transfer, sell or otherwise make known to unauthorized persons or programs outside of the Emergency Food Assistance Program the personal information without express written consent of the client or as provided by law. (See **Exhibit B**, a sample client release form.)

6. Criteria for Tribal Lead Grantees

- Must have management capabilities to administer sub grants with one or more tribes.
- Have written concurrence from each tribe with the application it will sub grant with. This means that each tribe the grantee represents must select the tribal grantee.
- The lead tribal grantee does not have to issue food vouchers to be a grantee.

7. Lead Tribal Grantees Must Enter Into Sub Grants

Lead tribal grantees must enter into sub grant agreements with each tribe participating in EFAP. These sub grants must include:

- Signed Face Sheet by both parties, and include a budget.
- Signed assurances that sub grantees will comply with all applicable policies and procedures.
- Completed matching funds worksheet.
- Evidence of adequate liability insurance.
- Proof of 501c3 status if sub grantee is not a recognized tribe.
- If applicable, an audit or Accounting System Verification. (See Policy 4.2.2 for audit requirements.)

POLICY

Cancels: Policy 400, April 8, 2008

See Also: POL 4.1 & POL 4.2

General Terms & Conditions

Approved by: Susan Eichrodt

POL-4.3 CRITERIA FOR PROSPECTIVE SUB GRANTEES

This policy applies to tribal lead agency grantees and tribal sub grantees.

1. Sub Granting Tribes Must Meet Criteria Before Receiving EFAP Funding

The lead tribal grantee shall determine the eligibility of a new tribe prior to sub grants being issued. A prospective tribal sub grantee must:

- Be a recognized tribe, or a 501(c) 3 private nonprofit agency.
- Coordinate emergency food services with similar programs administered by the federal government, Washington State, and other community organizations.
- Have information available for clients about other resources such as job training, mental health and substance abuse counseling, emergency housing, rental assistance, cash assistance, child care and energy assistance.
- Practice nondiscrimination in all programs, services, and employment.
- Tribes agree to comply with all state and federal laws regarding discrimination to the extent that those laws are applicable to the tribes for the activities that the tribes carry out pursuant to this Agreement. Nothing in this Agreement shall interfere with, or be construed as interfering with, tribes' employment and granting processes regarding Tribal and Indian preference as allowed by law.
- If receiving a cash grant, it must:
 - a. Have established internal controls and fund accounting procedures to assure the proper disbursement of, and accounting for, all funds provided. Provide the grantee with an annual A-133 audit if it receives federal funds totaling \$500,000 or more per year from all sources, or an independent financial audit once every two years if it receives \$100,000 or more per year in state funds from all sources. If neither of those applies, it must provide the grantee with a completed Accounting System Verification Form if its sub grant is \$10,000 or more per year. A lead agency grantee, at its discretion, may require an Accounting System Verification Form or audit for sub grantees that receive under \$10,000 per year.
- Must secure public liability insurance to protect against legal liability arising out of services provided under this grant that includes a comprehensive indemnification clause holding harmless the grantee, the Department, the state of Washington, its officers, employees and authorized agents.

- Must have a written policy on personal client information collected used or acquired in connection with any state-funded program used for the purpose of that program.
- Agrees not to release, divulge, publish, transfer, sell or otherwise make known to unauthorized persons the personal information without express written consent of the client or as provided by law.
- Use funds provided by the Department to operate only the Emergency Food Assistance Program designed to provide emergency food vouchers to individuals.
- Must match its EFAP funds with at least 35 percent in other funding. At least half of that match must be cash funding. The remaining match may be in-kind donations such as food vouchers, labor, and transportation.

POLICY

Cancels: Policy 500, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-5.1 GRANTEE PROGRAM MANAGEMENT AND ADMINISTRATION

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Grant Amounts Are Based on the Availability of Funds and Allocation Formula

- Grant awards are on the amount of EFAP funds available and the allocation formula approved by the Department.
- If there is a reduction or increase in the amount of program funds available, the Department may reduce or increase the amount of a grantee's original award.
- Legislative actions usually result in reductions or increases in the amount of funds budgeted to EFAP. However, there may be other causes prompting a change in funding.
- In the case of budget changes, the Department will send the grantee a grant amendment specifying the amount of the reduction or increase.
- The lead grantee must also send an amendment to all affected sub grantees indicating their budget changes where applicable.

2. Expenditures Are Limited By the Grant

Expenditures are limited to the amounts on the grant face sheet for each fiscal year, even though grants cover a two-year period. Each fiscal year stands alone.

- Funds not spent in the first year can not be carried over to the second year of the grant.
- Second year funds may not be spent in the first year.

3. EFAP Is A Reimbursement Program

Costs are reportable for the month in which the expenditures are incurred.

- Incurred is defined as when a grantee or sub grantee either receives the bill or invoice or when it has indicated in its financial accounts that the cost has been incurred, depending on the fiscal system of the agency or tribe.
- Sub grantees must provide grantees with all backup documentation of costs incurred.

- In the case of reimbursement for salary, the month in which an employee worked in the emergency food program, as indicated by the employee's time sheet is reimbursable.
- Grantees must reconcile monthly the costs they actually pay with what they billed CTED if there is a discrepancy in the two.

4. Lead Tribal Grantees Must Provide Sub Grantees Program Information

- Leads must relate program information that affects the management of EFAP to its sub grantees. This includes information on new, modified, and ongoing policies and procedures.
- Leads must provide sub grantees with a copy of EFAP's Policies and Procedures.
- Leads must offer technical assistance to help sub grantees carry out their EFAP obligations.

5. CTED May Require Grantees to Attend Meetings or Trainings

Notification of required attendance at meetings with a Policy Memorandum will be sent by EFAP. These may include meetings for:

- Updating grantees on policies or procedures.
- Providing information on changes in legislation affecting EFAP.
- Providing training that would result in better service to clients.

POLICY

Cancels: Policy 500, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-5.2 EXPENDITURE AND DATA REPORTS REQUIREMENTS

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Tribal Grantees and Sub Grantees Shall Complete Expenditure and Data Reports

Effective July 1, 2008, Tribal Grantees have the option to submit expenditure reports monthly or quarterly, which identifies the costs incurred for work performed since the previous report was submitted.

- All grantees must identify the method to submit the expenditure report, monthly or quarterly during the application process.
- Once a grantee selects a method it must use that method throughout the grant period.
- A grantee will not be allowed to change its method between monthly and quarterly during the grant period.
- Those choosing to submit quarterly must keep monthly records of expenditures and client data and submit each month's report individually for the quarter.
- Grantees with sub grantees, at their own discretion, may offer this option to their sub grantees.
- All sub grantees under a single grantee must agree to the same method to avoid the grantee having to track expenditures differently for individual sub grantees.
- If the sub grantees elect to bill quarterly, they must keep monthly records of expenditures and client data and submit each month's report individually for the quarter to their grantee to summarize their expenditures and client data.
- Grantees compile that information and then must submit each month's report individually to CTED for that quarter.
- Sub grantees must submit backup expenditure documentation to grantees with all expenditure reports.
- Participating tribal agencies will not be penalized for clients refusing to give requested data.

2. Failure To Submit Expenditure Reports

The Department may recapture unclaimed funds if grantees do not submit expenditure reports in a timely manner.

- For monthly billers, if the grantee fails to file an expenditure report within any two consecutive month period, the Department may elect to terminate the grant.
- Lead grantees may recapture unclaimed funds or terminate the grant with sub grantees based on the same criteria.
- For quarterly billers, if the grantee fails to file the three monthly expenditure reports for the quarter within 30 days of the end of the quarter, the Department may elect to terminate the grant.
- Lead grantees may recapture unclaimed funds or terminate the grant with sub grantees based on the same criteria.

POLICY

Cancels: Policy 500, April 8, 2008

See Also: POL 6.2

Approved by: Susan Eichrodt

POL-5.3 REPORTING CRITERIA

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Reporting Criteria for Grantees and Sub Grantees

- Lead grantees must:
 - Fill out reports summarizing program expenditures and monthly client data for themselves and sub grantees on the form provided by CTED.
 - Maintain sub grantees' reports and supporting documentation in the grantee's files. These files must be made available to Department program staff upon request.
- Tribal Grantees must submit to EFAP:
 - All EFAP related costs.
 - Clients served each month, new and returning, by age group, and number of households served, new and returning.
- Quarterly Reporters must include each month's report identifying all EFAP related costs and client data.
 - First quarter reports include the three reports for July, August and September, due by October 15.
 - Second quarter includes October, November, and December, due by January 15.
 - Third quarter includes January, February, and March, due by April 15.
 - Fourth quarter includes April, May and June, due by July 15.
- Tribal Sub grantees (Voucher Only) must submit:
 - All EFAP related expenses.
 - Clients served each month, new and returning, by age group, and number of households served, new and returning.

2. The Department Issues The Forms Required For Submitting Reports By Grantees

- The Department shall provide grantees the forms on which expenditures and client data will be reported.

3. Close Out Report Required

- The grantee must submit Closeout reports after the close of each fiscal year as required by the Department, during the transfer of obligations to another grantee, or upon termination of the grant for any reason.
- The final expenditure report shall accurately reflect the work completed and the funds expended by the grantee during the grant period.

4. Required Reports and Due Dates

- | | |
|--|--|
| a. Tribal Monthly Billers: Emergency Food Assistance Program Expenditure Report and Request for Reimbursement. | The 15th of the month following provision of services. |
| b. Tribal Quarterly Billers: Emergency Food Assistance Program Expenditure Report and Request for Reimbursement. | The 15th of the month following the quarter for the provision of services: October 15, January 15, April 15 and July 15. |
| c. Tribal Quarterly Billers: Demographics client data. | The 15th of the month following the quarter for the provision of services: October 15, January 15, April 15 and July 15. |
| d. All Tribal Grantees -- Emergency Food Assistance Closeout Report. | Forty-five days after the close of the fiscal year. |
| e. All Tribal Grantees – Other Reports as requested by CTED | By time indicated by CTED. |

POLICY

Cancels: Policy 500, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-5.4 WRITTEN CLIENT PRIVACY STANDARDS REQUIREMENTS

This policy applies to tribal grantees, tribal lead agency grantees, and tribal sub grantees.

1. Grantees and Sub Grantees Must Have Written Client Privacy Standards

Grantees and sub grantees must respect the privacy of clients. Personal information collected, used or acquired in connection with providing emergency food services must be used only for the purpose of those programs.

- Personal information includes any information that identifies an individual's health, education, business, use or receipt of governmental services, names, addresses, age, telephone numbers, social security numbers, driver's license numbers and finances including financial profiles, credit card numbers or other identifying numbers.
- Providers cannot release, divulge, publish, transfer, sell or otherwise make known to unauthorized persons the personal information without express written consent of the client or as provided by law.
- Written consent must include what client information can be shared and to whom or which agencies/businesses.
- Providers must implement physical, electronic and managerial safeguards to prevent unauthorized access to personal information.

2. Monitoring by CTED of Personal Information Collected

CTED reserves the right to monitor, audit or investigate the use of personal information collected, used or acquired by the Grantees.

- Not properly maintaining clients' private information could result in termination of grant or sub grant.
- Grantees agree to indemnify and hold harmless CTED for any damages related to the Grantee's unauthorized use of personal information.
- Lead Grantees have the responsibility to monitor the use of personal information collected by sub grantees.
- Sub grantees agree to indemnify and hold harmless the Grantee for any damages related to the sub grantee's unauthorized use of personal information.

POLICY

Cancels: Policy 500, April 8, 2008

See Also: POL 4.3

Approved by: Susan Eichrodt

POL-5.5 LEAD GRANTEE RESPONSIBILITIES

This policy applies to tribal lead agency grantees and tribal sub grantees.

1. Lead Grantees Must Monitor For the Performance of Sub Grantees

- Grantees are responsible for monitoring sub grantees' activities to assure that they are following department policies.
- This includes verifying that sub grantees meet all criteria listed in Policy 4.3.
- Verifies all EFAP expenditures are appropriate and being reported monthly, and that other applicable policy are being followed.
- They must monitor sub grantees at least once per grant period (once every other year). They must:
 - Produce a written report summarizing their monitoring visits with any corrective action needed.
 - Follow up on any findings and make a notation in the sub grantee's file of corrective action.

2. A Tribal Grantee with Sub Grants May Request Permission from CTED to Reallocate Funds

- Tribal lead grantee may request a reallocation of funds among its sub granting tribes if it can adequately provide CTED with documentation of the change in need.
- The grantee must also submit verification that all affected tribes agreed with the transfer.

POLICY

Cancels: Policy 600, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-6.1 DEPARTMENT PROGRAM MANAGEMENT AND ADMINISTRATION

This policy applies to the Department staff when carrying out the duties and responsibilities of the Emergency Food Assistance Program.

1. Department Staff Shall Monitor Grants

Department staff conduct monitoring by evaluating monthly expenditure reports and responses to other requests. At any time, the Department may request a grantee to send in any and all supporting documentation for expenditures.

- EFAP Staff complete risk assessments at the beginning of each grant period to help determine the level and frequency of monitoring.
- EFAP staff will monitor grantees that are performing at a very high level every four years and grantees that have serious performance issues every two years or more often if warranted.
- Monitoring can be on-site or a desk monitoring shall and take place when otherwise deemed necessary.
- EFAP staff will complete a desk monitoring only with grantees who have EFAP budgets of less than \$15,000 per year unless there are serious performance issues.
- If a grantee has violated any of the conditions set forth in the grant, CTED staff may conduct a site visit to investigate the violation.

2. On-Site Monitoring

- Department staff will normally schedule visits with the Grantee approximately two to four weeks before the visit with the Tribal Chair or executive director, program and fiscal staff.
- Documentation may be requested ahead of time for review or reviewed on site.
- Staff will review results of the visit, including areas of exemplary performance and adverse findings, and make recommendations to the grantee at the end of the visit.
- Within 30 days of the visit, staff will prepare a formal written report consistent with the oral report and send a copy of the report to the grantee's executive director or tribal chairperson. The Department will keep a copy of the report on file.

- If necessary, staff will develop an action plan, including due dates of responses with the grantee to ensure that identified problems are addressed in a timely and appropriate manner.

3. Desk Monitoring

- When Department staff perform a desk monitoring, they will request Grantees mail documentation for review.
- Staff will review results, including areas of exemplary performance and/or findings, and make recommendations to the grantee at the end of the monitoring.
- Within 30 days of completing the desk review, staff will prepare a formal written report and send a copy of the report to the grantee's executive director or tribal chairperson. The Department will keep a copy of the report on file.
- If necessary, staff will develop an action plan, including due dates of responses with the grantee to ensure that identified problems are addressed in a timely and appropriate manner.

4. Department Staff Shall Offer Technical Assistance to Grantees

Department staff shall offer technical assistance to grantees when needed. This includes information on program and fiscal issues. When necessary, staff will conduct an on-site visit to provide this service.

POLICY

Cancels: Policy 600, April 8, 2008

See Also: General Terms & Conditions

Approved by: Susan Eichrodt

POL-6.2 GRANT COMPLIANCE

1. Department May Recapture and Reallocate Grantee Funds

The Department may recapture unclaimed funds if grantees do not submit expenditure reports in a timely manner.

- For monthly billers, if the grantee fails to file an expenditure report within any two consecutive month period, the Department may elect to terminate the grant.
- For quarterly billers, if the grantee fails to file the three monthly expenditure reports for the quarter within 30 days of the end of the quarter, the Department may elect to terminate the grant.
- Lead grantees may recapture unclaimed funds or terminate the grant with sub grantees based on the same criteria.
- The Department reviews the grantee's level of actual performance after nine months each fiscal year. If the grantee has failed to achieve 65 percent of its yearly performance goals (expenditures and activities) stated on the grant face sheet by March 31, the Department may reduce funds available based on actual performance and negotiation between the Department and the grantee.
- A tribal grantee with sub grantees may also reallocate funds from one of its sub granting tribes to another, with the Department's permission, if a tribe does not claim, or only partially spends, its portion of the tribal funds.

2. Department May Suspend or Terminate Grantee Funds

- The Department may suspend or terminate funding to Emergency Food Assistance Program grantees when monitoring reports or the independent audit reports indicate substantial noncompliance with established policies, grant requirements, accounting procedures, or fiscal control requirements that are not corrected in a timely manner.
- Action to suspend or terminate funding will be taken if repeated communication with the agency's governing board fails to produce corrective action.

- CTED must allow the grantee 30 days to come into compliance prior to terminating a grant.
- The Department reserves the right to suspend all or part of the Grant, withhold further payments, or prohibit the Grantee from incurring additional obligations of funds during investigation of the alleged compliance breach and pending corrective action by the Grantee or a decision by the Department to terminate the Grant.
- If an EFAP tribal grantee filing reports monthly fails to file a monthly expenditure report for two consecutive months, the Department may elect to terminate funding.
- If an EFAP tribal grantee filing quarterly fails to file the three monthly expenditure reports within 30 days of the end of a quarter, the Department may elect to terminate funding.

3. Lead Grantees May Suspend or Terminate Sub-Grantee Funds

Lead Grantees may suspend or terminate funding to sub grantee tribes according to the above criteria. The grantee must notify the Department prior to taking any corrective action.

POLICY

Cancels: Policy 700, April 8, 2008

See Also: PRO 7.1.A

Approved by: Susan Eichrodt

POL-7.1 GRANTEE APPEAL PROCESS

This policy applies to all the Department, applicants, and lead agency grantees, tribal grantees and sub grantees.

1. Applicants and Grantees May Appeal Department's Decisions

Any substantive decision of the Department to deny, award, recapture, reallocate, suspend or terminate funds which an EFAP applicant or grantee believes to be unfair, unreasonable, or have a major adverse impact on the local delivery of service, may be appealed by the applicant/grantee.

2. Applicants/Grantees Have 15 Days to Appeal

- Applicants/Grantees have fifteen days to submit an appeal to the Department.

3. The Department Will Schedule a Hearing

- Within ten days of receiving the appeal, the Department will schedule a hearing and appoint a hearing officer.
- Both parties will decide on a mutually agreed upon location.

4. The Department Will Contact the Appellant

- The Department will notify the appellant of the time, date and place of the hearing and obtain any pertinent information for the hearing.
- The parties will attempt to explore alternatives that will eliminate the necessity of the hearing.

5. The Department's Designated Hearing Officer Will Conduct the Hearing

The appellant has the right to be represented by counsel, but must notify the lead agency at least five working days prior to the hearing if counsel will be present. Either side may request that a representative of CTED be present to assist in clarifying any program policies or procedures.

PROCEDURE

Cancels: Policy 700, April 8, 2008

See Also: POL-700

Approved by: Susan Eichrodt

POL-7.1.A GRANTEE APPEAL PROCEDURE

Action By:

Action:

Applicants and Grantees

1. Submit a letter within 15 days of the receipt of the Department's decision to deny, award, reallocate suspend or terminate funds approved by its governing board and signed by the board chairperson to the Department which states:

- The decision that is being questioned.
- The date on which the applicant or grantee received notice of the decision.
- The rationale of the board for considering the decision to be substantive and unfair or unreasonable to the agency.
- The request for a hearing, including the desired outcome of such a hearing.

The Department

2. The Department schedules a hearing date within 10 working days of receipt of the request for a hearing.

3. The Department director or his/her designee will identify the hearing officer.

The Department, Applicants and Grantees

4. The parties involved mutually decide on the location of the hearing.

The Department

5. Sends the appellant written notice of the time and place of the hearing, scheduling it no later than two weeks from the date the request is received.

6. Contacts the board chairperson and the executive director of the appellant agency prior to the scheduled hearing to:

- Obtain additional information pertinent to the issue.
- Clarify any misunderstandings.
- Explore possible alternatives that would eliminate the necessity for a hearing.
- Obtain a written withdrawal of the request for a hearing if issues are resolved.

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| Appellant | 8. Notify the hearing officer at least five working days prior to the hearing if counsel will be present. |
| Department Designated Hearing Office | 9. Conducts the hearing. |
| Department Designated Hearing Office | 10. Reviews all information and evidence presented at the hearing and recommend a decision to the Department. |
| Department | 11. Issues within ten working days of the hearing a written decision on the appeal based on the facts and program guidelines. |
| Appellant | 12. If the appellant remains unsatisfied, nothing in this process shall be construed to limit the parties' choice of a mutually acceptable alternate dispute resolution (ADR) method in addition to the hearing procedure outlined above. |

POLICY

Cancels: Policy 700, April 8, 2008

See Also:

Approved by: Susan Eichrodt

POL-7.2 SUBGRANTEE APPEAL PROCESS

1. Sub Grantees May Appeal Decisions

- Sub grantees and applicant sub grantees may appeal any substantive decision of its lead agency to deny, award, recapture, reallocate, suspend or terminate funds that the sub grantee believes to be unfair, unreasonable, or have a major adverse impact on local delivery of services.
- Lead agencies must provide sub grantees/applicants with a copy of the appeal policy and procedure prior to or with any substantive decision.
- Any decision of a lead agency to deny, award, recapture, reallocate, suspend or terminate funds will stand until the appeal process is completed and will only be modified or reversed as a result of the appeal process.

2. The Sub Grantee Appeal Process Mirrors the Applicant/Grantee Appeal Process

The sub grantee and grantee shall follow the same procedure in 7.2.1 above when a sub grantee disagrees with a decision of the grantee. The appellant has the right to be represented by counsel, but must notify the lead agency at least five working days prior to the hearing if counsel will be present. Either side may request that a representative of CTED be present to assist in clarifying any program policies or procedures.

PROCEDURE

Cancels: Policy 300, April 8, 2008

See Also: POL-700

Approved by: Susan Eichrodt

POL-7.2.A SUBGRANTEE APPEAL PROCEDURE

Action By:

Action:

Sub-Grantees

1. Submit a letter within 15 days of the receipt of the Department's decision to deny, award, reallocate suspend or terminate funds approved by its governing board and signed by the board chairperson to the Department which states:

- The decision that is being questioned.
- The date on which the applicant or grantee received notice of the decision.
- The rationale of the board for considering the decision to be substantive and unfair or unreasonable to the agency.
- The request for a hearing, including the desired outcome of such a hearing.

Lead agency's director or designee

2. Schedules a hearing date within 10 working days of receipt of the request for a hearing.

3. Identify the hearing officer.

Lead agency's director or designee and sub-grantee

4. The parties involved mutually decide on the location of the hearing.

Lead agency

5. Sends the appellant written notice of the time and place of the hearing, scheduling it no later than two weeks from the date the request is received.

6. Contacts the board chairperson and the executive director of the appellant agency prior to the scheduled hearing to:

- Obtain additional information pertinent to the issue.
- Clarify any misunderstandings.
- Explore possible alternatives that would eliminate the necessity for a hearing.
- Obtain a written withdrawal of the request for a hearing if issues are resolved.

- | | |
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| Appellant | 8. Notify the hearing officer at least five working days prior to the hearing if counsel will be present. |
| Hearing Officer designee | 9. Conducts the hearing. |
| Hearing Officer designee | 10. Reviews all information and evidence presented at the hearing and recommend a decision to the lead agency. |
| Department | 11. Issues within ten working days of the hearing a written decision on the appeal based on the facts and program guidelines. The decision of the lead agency is final. |
| Appellant | 12. May appeal the lead agency's decision directly to CTED by submitting a letter to the Department and the lead agency within 15 days of the lead agency's decision. |
| Department | 13. Decides if the case warrants further appeal.
If not, notifies the appellant and the lead agency involved within 15 days of receiving the request for appeal of its decision. |
| Appellant | 14. If the appellant remains unsatisfied, nothing in this process shall be construed to limit the parties' choice of a mutually acceptable alternate dispute resolution (ADR) method in addition to the hearing procedure outlined above. |

ESSENTIAL NONFOOD ITEMS LIST

- Cleaning Supplies
- Toothpaste and Floss
- Deodorant
- Detergent
- Diapers
- Dish Soap
- Facial Tissue
- Feminine Products
- Hand Soap
- Paper Towels
- Shaving products
- Shampoo
- Toilet Paper
- Toothbrush
- Teeth/Denture Adhesive and Cleaner Products

CLIENT RELEASE OF INFORMATION

I, _____ (name of recipient), give
_____ (name of agency/tribe) permission
to release the following personal information:

_____.

This information may be released to the following programs or
organizations: _____
_____.

Signed,

Client's Signature

Date

Anatomy of MyPyramid

One size doesn't fit all

USDA's new MyPyramid symbolizes a personalized approach to healthy eating and physical activity. The symbol has been designed to be simple. It has been developed to remind consumers to make healthy food choices and to be active every day. The different parts of the symbol are described below.

Activity

Activity is represented by the steps and the person climbing them, as a reminder of the importance of daily physical activity.

Moderation

Moderation is represented by the narrowing of each food group from bottom to top. The wider base stands for foods with little or no solid fats or added sugars. These should be selected more often. The narrower top area stands for foods containing more added sugars and solid fats. The more active you are, the more of these foods can fit into your diet.

Personalization

Personalization is shown by the person on the steps, the slogan, and the URL. Find the kinds and amounts of food to eat each day at MyPyramid.gov.

Proportionality

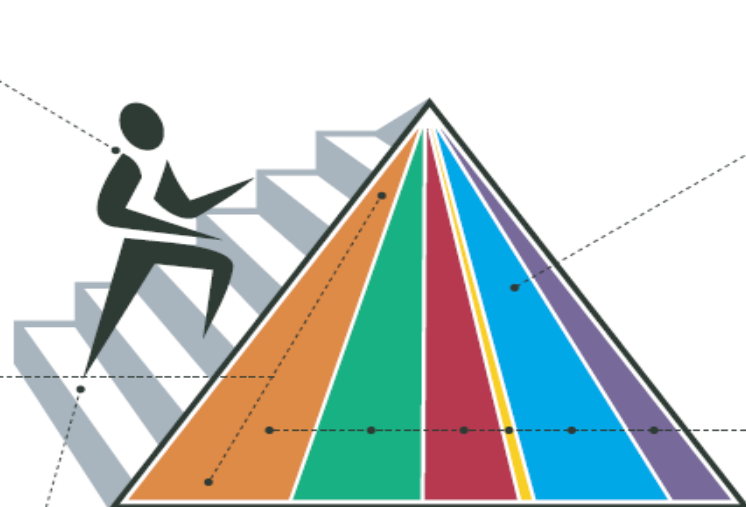
Proportionality is shown by the different widths of the food group bands. The widths suggest how much food a person should choose from each group. The widths are just a general guide, not exact proportions. Check the Web site for how much is right for you.

Variety

Variety is symbolized by the 6 color bands representing the 5 food groups of the Pyramid and oils. This illustrates that foods from all groups are needed each day for good health.

Gradual Improvement

Gradual improvement is encouraged by the slogan. It suggests that individuals can benefit from taking small steps to improve their diet and lifestyle each day.



MyPyramid.gov
STEPS TO A HEALTHIER YOU

USDA U.S. Department of Agriculture
Center for Nutrition Policy
and Promotion
April 2005 CNPP-16

USDA is an equal opportunity provider and employer.

GRAINS

VEGETABLES

FRUITS

OILS

MILK

**MEAT &
BEANS**

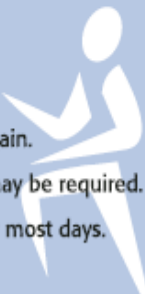
GRAINS Make half your grains whole	VEGETABLES Vary your veggies	FRUITS Focus on fruits	MILK Get your calcium-rich foods	MEAT & BEANS Go lean with protein
<p>Eat at least 3 oz. of whole-grain cereals, breads, crackers, rice, or pasta every day</p> <p>1 oz. is about 1 slice of bread, about 1 cup of breakfast cereal, or 1/2 cup of cooked rice, cereal, or pasta</p>	<p>Eat more dark-green veggies like broccoli, spinach, and other dark leafy greens</p> <p>Eat more orange vegetables like carrots and sweetpotatoes</p> <p>Eat more dry beans and peas like pinto beans, kidney beans, and lentils</p>	<p>Eat a variety of fruit</p> <p>Choose fresh, frozen, canned, or dried fruit</p> <p>Go easy on fruit juices</p>	<p>Go low-fat or fat-free when you choose milk, yogurt, and other milk products</p> <p>If you don't or can't consume milk, choose lactose-free products or other calcium sources such as fortified foods and beverages</p>	<p>Choose low-fat or lean meats and poultry</p> <p>Bake it, broil it, or grill it</p> <p>Vary your protein routine — choose more fish, beans, peas, nuts, and seeds</p>

For a 2,000-calorie diet, you need the amounts below from each food group. To find the amounts that are right for you, go to MyPyramid.gov.

Eat 6 oz. every day	Eat 2 1/2 cups every day	Eat 2 cups every day	Get 3 cups every day; for kids aged 2 to 8, it's 2	Eat 5 1/2 oz. every day
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Find your balance between food and physical activity

- Be sure to stay within your daily calorie needs.
- Be physically active for at least 30 minutes most days of the week.
- About 60 minutes a day of physical activity may be needed to prevent weight gain.
- For sustaining weight loss, at least 60 to 90 minutes a day of physical activity may be required.
- Children and teenagers should be physically active for 60 minutes every day, or most days.



Know the limits on fats, sugars, and salt (sodium)

- Make most of your fat sources from fish, nuts, and vegetable oils.
- Limit solid fats like butter, margarine, shortening, and lard, as well as foods that contain these.
- Check the Nutrition Facts label to keep saturated fats, *trans* fats, and sodium low.
- Choose food and beverages low in added sugars. Added sugars contribute calories with few, if any, nutrients.

